

	Reference:	
Responsible Officer	Neil Crabtree	
Cabinet Member:	Cllr Hannah Roberts	
Support Officer	Joanne Collier/Samantha Cox	

Equality Impact Assessment Tool

Service Area:	Public Protection
Budget Reduction Title:	

Stage 1: Initial Assessment

1a	<p>Which service does this project, policy or proposal relate to?</p> <p>Neighbourhood Enforcement, Public Protection</p>
1b	<p>What is the project, policy or proposal?</p> <p>The proposal is to introduce the Selective Licensing of Private Landlords in a number of areas across the Borough, for a maximum 5-year period. The proposals of a phased approach would mean that phase one would affect just over 18 % of the private rented sector in Oldham. Phase two subject to Cabinet approval, the outcome of further consultation and potential Secretary of State approval approximately 40% of the private rented sector in the borough would be affected. This would mean that there could potentially areas of Selective Licensing in all of the 5 Districts.</p> <p>A Selective Licensing Scheme, aims to address the impact of poor-quality private landlords and antisocial tenants through management conditions to reduce or eliminate the blight of low housing demand, leading to improvements of the social and economic conditions of the sector and area.</p> <p>Once an area is designated for selective licensing any private landlord wishing to operate within the designated area must apply for a licence for every tenanted house within the designated area. The Selective Licensing of Houses (Specific Exemptions) (England) Order 2006 provides exemptions to some type of tenancies such as business tenancies, family member tenancies.</p> <p>In order to become a Licence holder, there will be a fit and proper person test. This means that a landlord has to meet certain standards set out in the Housing Act 2004 before they can legally rent out a property.</p> <p>Section 80 of the Housing Act 2004 gives powers to local housing authorities to designate areas, as subject to selective licensing in respect of privately rented accommodation, provided certain conditions are met. The reason for this designation is due to the areas proposed for Selective Licensing of being, or likely to become an area of low housing demand. A whole Borough review was carried out relating to the low housing demand indicators used were tenure, property prices, long term vacant, average rent levels and rental yields.</p> <p>The scheme is to be combined with other measures, will form part of a wider strategy and is consistent with the Council's Housing Strategy to address low housing demand.</p> <p>Statutory consultation was carried out for over the minimum 10-week statutory consultation period with a variety of consultees within and surrounding the proposed areas, via a range of measures and widely publicized.</p> <p>A Selective Licensing has previously been implemented from 2015 until 2020. Some of the areas proposed in the new Selective Licensing scheme were in the previous scheme.</p> <p>The evidence base for selection of these particular areas, review of the previous scheme and consultation program and outcome can be found on Oldham Council's website decision details.</p>

The licensing scheme will be self-financing at a cost per property of up to a maximum £650. This figure is calculated on the scheme being not-for-profit and is based on the number of properties requiring a Licence and the number of staff needed to inspect and administer the Licence. The fee does not include any costs for enforcement action. It is anticipated that if the preferred option of a two phased implementation is approved that there will be approximately 1,856 privately rented properties requiring a Licence across the proposed designation area in Phase One and approximately 2,457 in Phase Two for statutory consultation. This meaning a total of 4313 private rented properties, which is 39.78% of Oldham's private rented sector being impacted. The following areas would be affected:

PHASE 1

LSOA Name	LSOA No	No Private Rented	% of Total Private Rented (Oldham)
Alexandra	E01005322	108	0.99
St Mary's	E01005431	153	1.40
St Mary's	E01005428	142	1.30
Werneth	E01005463	70	0.64
Waterhead	E01005450	173	1.58
Alexandra	E01005320	161	1.47
Alexandra	E01005321	139	1.27
Alexandra	E01005434	171	1.56
Chadderton Sth	E01005344	147	1.34
Hollinwood	E01005382	100	0.91
Medlock Vale	E01005438	233	2.13
St Mary's	E01005433	114	1.04
St Mary's	E01005429	75	0.69
Werneth	E01032921	70	1.04
TOTAL		1,856	17.36%

PHASE 2

LSOA name	LSOA No	No Private Rented	% of Total Private Rented (Oldham)
Coldhurst	E01005349	108	0.99
Medlock Vale	E01005323	102	0.93
Shaw	E01005445	180	1.64
St James	E01005421	170	1.55
St Mary's	E01005429	75	0.69
Waterhead	E01005448	104	0.94
Waterhead	E01005456	107	0.98
Chadderton Nth	E01005337	134	1.22
Chadderton Sth	E01005342	75	0.69
Coldhurst	E01005351	86	0.79
Failsworth East	E01005368	162	1.48
Failsworth West	E01005370	93	0.85
Hollinwood	E01005376	103	0.94
Hollinwood	E01005378	130	1.19
Medlock Vale	E01005325	34	0.31
Medlock Vale	E01005435	111	1.01
Medlock Vale	E01005437	114	1.04
St James	E01032920	145	1.32
St Mary's	E01005326	72	0.66
St Mary's	E01005427	64	0.58
St Mary's	E01005432	77	0.70
Waterhead	E01005455	89	0.81
Werneth	E01005460	122	1.11

	TOTAL	2457	22.42%
1c	What are the main aims of the project, policy or proposal?		
	<p>A Selective Licensing Scheme, aims to address the impact of poor-quality private landlords and antisocial tenants through management conditions to reduce or eliminate the blight of low housing demand, leading to improvements of the social and economic conditions of the sector and area.</p> <p>The Council proposes to introduce selective licensing because poor housing management and low standards in the private rented sector can lead to the failure of a local housing market. People leave the area, house prices fall, speculative landlords move in, and the local community becomes weaker. Low demand and antisocial behaviour can result in unsettled communities, along with other social and economic problems. These can undermine the efforts to regenerate an area.</p> <p>Improving the management of private rented properties will help:</p> <ul style="list-style-type: none"> • make renting a more viable option in the longer term. • make the sector more professional private rented sector. • ensure landlords have comprehensive tenancy management practises in place and understand their rights and responsibilities. • encourage landlords to let properties for a longer term • encourage tenants to stay longer in properties • long term to build communities and to invest where they live reducing nuisance/waste and ASB. • encourage tenants to understand their rights and responsibilities. • local authority to be aware of the landlords operating, build trust and encourage working in partnership to maximize the use of privately rented properties to help meet a range of housing needs and investment opportunities. • offer choice and flexibility. <p>The Selective Licensing of Private Rented Properties report shows how selective licensing supports the Council’s Housing Strategy and identifies the specific measures at neighbourhood level that selective licensing will work alongside in order to improve low demand and problems associated with it.</p> <p>Introducing selective licensing provides the Council powers to deal with the management of private rented properties by ensuring:-</p> <ul style="list-style-type: none"> • That landlords are ‘fit and proper’. • Landlords understand their responsibilities concerning management standards through licence conditions. • Support for landlords. • Education for tenants on their responsibilities. • Improve property standards. • Multi agency approach to find solutions to issues within the private rented sector. <p>The proposed Licensing Conditions can be found in Appendix 6 of the Selective Licensing report. The Housing Act 2004 prescribes certain mandatory licence conditions that must be include in any Selective Licensing scheme. The Council can and have added additional licensing conditions to ensure that management standards are improved.</p>		
1d	Who, potentially, could this project, policy or proposal either benefit or have a detrimental effect on, and how?		
	WHO	BENEFITS	DETRIMENTAL

	<p>Landlords</p>	<p>Will receive information and support;</p> <p>Licensing creates a level playing field so all landlords in the proposed areas will be required to comply with the same management licence conditions. Landlords who fail the fit and proper criteria will have to instruct someone who is to manage their properties. Landlords who fail to comply with selective licensing will face civil penalties/prosecution.</p> <p>Landlords will receive support, signposting and training to improve/assist with issues;</p> <p>Improved rental income and potential capital value as areas improve;</p> <p>Improvement in the reputation of private landlords;</p> <p>Shorter void periods and reduced tenant turnover.</p> <p>Making it easier to involve all landlords in wider strategies including crime reduction initiatives, local spatial strategies and other countywide plans.</p>	<p>Payment of the Licence Fee up to a maximum £650 per property:</p> <p>Landlords may own multiple properties and be required to pay a number of selective licensing fees.</p> <p>Some accidental landlords use the rent as a second income due to being unable to sell the property and being on a low income. The rent often covers the mortgage for the property.</p> <p>Overburden on good landlords</p> <p>Selective Licensing does not distinguish between landlords who are already compliant with management conditions and those that are not. Therefore all landlords whether already meeting the licence conditions and more are required to complete an application/submit certificates and pay the licence fee.</p>
	<p>Tenants</p>	<p>Clearly defined Licence Conditions should bring about improvements to the management and quality of the property.</p> <p>Clear information for tenants about terms of occupation;</p> <p>Tenants could also see economic benefits, for example in improved likelihood of regaining any deposit paid.</p> <p>Improved safety of living conditions, for example, smoke alarms installed/maintained, gas</p>	<p>Tenants may ultimately pay the licence fee via an increase in rent.</p> <p>This could potentially increase the cost of living and impact residents who are on the lowest incomes. However, if the tenant is receiving Housing Benefit, then this could cover any transferred increase.</p> <p>Some tenants of good landlords have felt the Councils intervention has affected their previously good relationship with the landlord and found the condition audit</p>

		<p>safety certificates required, electrical safety of appliances supplied.</p> <p>Improvements to the neighbourhood would also benefit private tenants' security and sense of community;</p> <p>Better management practices should help to increase length of tenure and reduced incidence of unplanned moves or homelessness.</p> <p>Tenants who require assistance, however, are too worried about repercussions or do not know who to turn to are provided support. The scheme enables the Council to identify the issues without the need for the tenant to complain.</p>	<p>linked to selective licensing as intrusive.</p>
	<p>Neighbourhoods and Communities</p>	<p>Increasing housing demand and reducing antisocial behaviour will improve problem areas, making them safer, more desirable places to live, which may, over time, increase property values.</p> <p>Reducing environmental costs and costs of crime, such as street cleaning and tackling fly tipping;</p> <p>Making it easier to involve all landlords in wider strategies including crime reduction initiatives, local spatial strategies and other countywide plans.</p> <p>Protecting vulnerable groups, who are often occupiers of privately rented accommodation which is poorly managed and maintained.</p> <p>A positive economic future for the local community and local business.</p>	<p>Landlords may sell the properties instead of paying the licence fee, especially if they have multiple properties. However, the purpose of the selective licensing criteria is to improve the level of housing demand and to improve the social or economic conditions of the area. The fee is equivalent to one month up to two months' rent and is likely to be less than the cost associated with selling a property which could entail agent fees, listing fees and other associated costs. Although some landlords did sell their properties there was no evidence this was linked to selective licensing. In addition there was no evidence that selective licensing affected new landlords buying properties in the designated areas.</p> <p>There has been a decrease in the number of empty properties.</p>

		Building a community where all tenures feel valued and discussions between residents take place.			
1e	Does the project, policy or proposal have the potential to <u>disproportionately</u> impact on any of the following groups?				
		None	Positive	Negative	Not sure
	Disabled people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Particular ethnic groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Men or women (includes impacts due to pregnancy / maternity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People of particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People in a Marriage or Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People who are proposing to undergo, are undergoing, or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People on low incomes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	People in particular age groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Groups with particular faiths or beliefs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

1f	What do you think the overall NEGATIVE impact on groups and communities will be?	None / Minimal	Significant
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

1g	Using the screening and information in questions 1e and 1f, should a full assessment be carried out on the project, policy or proposal?	Yes <input checked="" type="checkbox"/>
		No <input type="checkbox"/>

1h	How have you come to this decision?	
	I have come to this decision as I am unsure whether certain groups will be impacted by the policy decision if approved and therefore further investigation is required.	

Stage 2: What do you know?

What do you know already?

The Council has already implemented a Selective Licensing scheme in certain areas of Oldham in 2015 – 2020. There were 2870 licensed landlords across the operation of this scheme. Equality Monitoring forms were sent as part of the application. 956 were completed and returned. A summary of the responses are below:

Gender:

	Count of Landlord
Female	255
Male	687
No Answer (blank)	14
Grand Total	956

Ethnicity:

	Count of Landlord
African	5
Any Other White Background	9
Arab	3
Bangladeshi	147
Chinese	3
East African Asian	1
English/Welsh/Scottish/British	344
Indian	36
Iranian	1
Irish	7
Italian	1
Mixed	1
No Answer	26
Other Asian Background	8
Pakistani	358
Russian	1
White and Asian	1
white and Black African	1
White and Black Carribean (blank)	3
Grand Total	956

Disability:

	Count of Landlord
No	726
No Answer (blank)	179
Yes	50
(blank)	1
Grand Total	956

Religion:

	Count of Landlord
Buddhist	3
Christian	172
Church of England	1
Hindu	22
Islam	1
Jewish	17
Methodist	1
Muslim	484
No Answer	122
No Religion	127
Other	3
Sikh	3
(blank)	
Grand Total	956

Sexual Orientation:

	Count of Landlord
Bisexual	14
Gay	4
Heterosexual	685
Lesbian	4
No Answer	247
No1	1
(blank)	
Grand Total	956

**Area Selective Licensing Property
Located:**

	Count of Landlord
Waterhead	1
Alexandra	53
Coldhurst	127
Hathershaw	145
Hollinwood	101
Oldham	
Edge	17
Primrose Bank	130
St Marys	116
Waterhead	265
(blank)	
Grand Total	955

Some of the areas in the previous scheme are proposed in the new scheme.

A whole borough statistical analysis was completed to determine which if any areas were exhibiting low housing demand. The robust evidence is provided in Appendix 2 & 3 Statistical Review May 2019 & Statistical Review Update December 2020. This shows that the proposals have been drawn together based on statistical evidence that was applied to the whole Borough, and although a review was required of the previous scheme it was not concentrated to these areas only. Some landlords have stated that the review was out of date and that it does not represent the current housing market. However a check of the analysis was commissioned in December 2020, which provided that the proposed areas were still exhibiting low housing demand.

The Council has consulted extensively with persons who could be affected by the proposed selective licensing scheme in the proposed and surrounding areas using a detailed draft proposal document as the basis for the consultation. The consultation program and outcome of consultation can be found as
Appendix 6 Consultation Program & Documents
Appendix 7 Consultation Outcome
Appendix 8 Consultation Representations

Once an area is designated for selective licensing any private landlord wishing to operate within the designated area must apply for a licence for every tenanted house within the designated area, therefore the scheme is non-discriminatory and there is deemed to be no disproportionate effect on any groups of society. The legislation does not distinguish between professional, accidental, portfolio or one property landlords.

The cost of the licence is up to a maximum of £650, which equates to one/two months' rent. Landlords have previously stated that this cost will be passed onto the tenants, however, there has been no evidence of this from the previous scheme. In addition tenants on the lowest incomes and accessing housing benefit/universal credit should be covered by any minimal increase. A two-stage payment process was previously put in place to assist landlords in paying the fee. The fee will be a two-phase process due to case law which states that any licensing fee must be split into an administration cost, followed by a monitoring and compliance fee once a licence has been granted.

Some landlords have stated that the rent only covers the mortgage of the property. Being a landlord is a business and businesses are expected to have contingencies for legislation changes/disrepair/period of vacancies etc.

Selective Licensing will be part of the overall strategic borough wide approach and fits with existing policies and will be used as a tool in conjunction with other measures to achieve its objective. Selective licensing of private landlords has previously shown to have a positive impact with some areas previously designated improving or staying the same. Through management conditions a Selective Licensing Scheme, aims to address the impact of poor-quality private landlords and antisocial tenants to reduce or eliminate the blight of low housing demand, leading to improvements of the social and economic conditions of the sector and area.

Homelessness and tenancy relations equality information

Points to Consider

- The Homeless Reduction Act (HRA) was introduced on the 3rd April 2018, this placed new duties on local authorities so that everyone who was homeless had access to meaningful help irrespective of their priority need status, this was not the case previously and meant that applications have increased since this dated
- Covid Pandemic and introduction of the Coronavirus Act 2020 and the impact on private rented sector

Tenancy Relation Figures

- The way data is collected has changed over the years.

- The data does show an increase since the introduction of the Coronavirus Act 2020
- Between 2 December 2015 to 22 November 2015 there were 19 approaches to the service.
- From January 2017 the service started offering advice this changed the number of approaches for assistance. There were on average 33 approaches every month to the Tenancy Relations service however these approaches were not all threats of unlawful evictions and harassment
- From 2020 the figures have been recorded differently and we can distinguish the difference between complaints for tenants relating threats of unlawful eviction from landlords and harassments for financial year 20/21.
- For the last two years there has been an issue with landlords not completing repairs in some harassment cases. The cases that have been complaints of harassment of unlawful eviction, 98% are in receipt of a state benefit, and rent arrears has been a key trigger for the harassment or unlawful eviction
- Most complaints come from OL8 and OL9 areas.

Figures for Financial year 2020

Total complaints for harassment and unlawful eviction for the full period is 37.

Quarter/Dates	No of Complaints of Harassment or Unlawful Eviction	Postcode property located complaint relates to.
Quarter 1 01/04/2020 - 31/06/2020	15	OL8, OL9,OL1,OL4 9 complaints from OL9 and OL8
Quarter 2 01/07/2020 - 30/09/2020	7	OL2,OL9,OL4,M35 2 complaints from OL9
Quarter 3 01/10/2020 - 31/12/2020	6	OL4,OL8,OL9, M35 3 complaints from OL4
Quarter 4 01/01/2021 - 31/03/2021	13	OL4,OL8,OL2,OL1,OL9 Main complaints from OL8 and OL9

Figures for Financial Year 2021

Quarter/ Dates	No of complaints	Invalid Notice	Harassment	Unlawful Evictions	Postcode property located complaint relates to.	<u>Nationality</u>
Quarter 1 01/04/2021 31/06/2021	54	48	6	0	OL4, OL9, OL8, OL2, OL1, M35 (OL2 received the least complaints, OL9 & OL8 received the most complaints)	29 UK Nationals 9 EU Nationals 3 Non-EEA Nationals
Quarter 2 01/07/2021 30/09/2021	61	45	13	3	OL4, OL9, OL8, OL2, OL1, M35 (OL9 receiving the most complaints M35 receiving the least)	41 UK Nationals 8 EU Nationals 2 Non-EEA Nationals

What don't you know?
<p>If language, faith, beliefs, and level of education are factors that may cause a barrier for tenants/landlords and communities to participate fully in Selective Licensing.</p> <p>Previous support has been provided by the Selective Licensing Team to assist landlords in completing the application form and attendance at community meetings.</p>
Further Data Collection
N/A

Summary (to be completed following analysis of the evidence above)

1e	Does the project, policy or proposal have the potential to <u>disproportionately</u> impact on any of the following groups?				
		None	Positive	Negative	Not sure
	Disabled people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Particular ethnic groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Men or women (includes impacts due to pregnancy / maternity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People of particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People in a Marriage or Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People who are proposing to undergo, are undergoing, or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People on low incomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People in particular age groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Groups with particular faiths or beliefs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?				
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Stage 3: What do we think the potential impact might be?

3 a	Who have you consulted with?
	<p>All residents, known Landlords, Managing Agents, Letting Agents, and Local Businesses within the proposed designation area, and adjacent to the proposed designation area.</p> <p>66 Stakeholders including the National Landlords Residential Association, The Bond Board, Tenants Union, North West Landlords, Citizen Advice Bureau, Housing Solicitors, Housing Associations, Greater Manchester Authorities, Shelter and Greater Manchester Police were contacted regarding the proposals.</p>

**3
b** **How did you consult? (include meeting dates, activity undertaken & groups consulted)**

The Housing Act 2004 and non-statutory guidance states that when considering a Selective Licensing scheme, the Local Authority must:

- Take reasonable steps to consult persons who are likely to be affected by the designation for a minimum of 10 weeks.
- Consider any representations made in accordance with the consultation.

The Council has consulted extensively with persons who could be affected by the proposed selective licensing scheme including the surrounding areas. The statutory consultation period commenced in January 2019. Although this consultation was still live and available during the pandemic, it was acknowledged that further consultation was required due to the significant impact and restrictions of the pandemic. Between January 2021 and April 2021, additional elements of the consultation program took place. The consultation period was not restrictive to this time period with information and discussions with consultees regarding the consultation still taking place beyond this.

Face to face doorstep interviews were an important consultation method used as part of the consultation for the previous selective licensing scheme. The pandemic prohibited

DATE	WHO CONSULTED	METHOD
January/February 2020	All residential and business properties within the proposed selective licensing areas for consultation 2020/2021. This equates to 18,000 properties	Mail out including proposals/paper survey/website details and contact for further information.
January – April 2020 & January -April 2021	Wide publicity to landlords/landlord representatives & residents/businesses within the proposed areas/the borough of Oldham and outside Oldham.	<p>Press releases</p> <p>https://www.oldham-chronicle.co.uk/news-features/139/main-news/132909/consultation-underway-to-see-if-selective-licensing-scheme-for-private-landlords-needed</p> <p>https://www.lettingagenttoday.co.uk/breaking-news/2020/1/thousands-of-landlords-rejected-for-licensing-scheme-claims-council</p> <p>https://www.oldham-chronicle.co.uk/news-features/139/main-news/138726/selective-licensing-scheme-%E2%80%93-you-can-still-have-your-say</p> <p>https://www.northwestlandlords.com/manchester-oldham-selective-licencing-consultations/</p> <p>https://www.landlordzone.co.uk/news/nw-council-re-starts-selective-</p>

		licencing-consultation-year-after-covid-scuppered-plans/ https://landlordsdefence.co.uk/we-rejected-thousands-of-landlords-for-selective-licensing-scheme-claims-oldham-council/ Licensing: Respond to current licensing consultations NRLA
January 2020 & ongoing relaunch in January 2021 until April 2021	Wide publicity to landlords/landlord representatives & residents/businesses within the proposed areas/the borough of Oldham and outside Oldham.	<p>Social Media</p> <p>Comms:</p> <ul style="list-style-type: none"> Two posts on Facebook/Twitter a week until the closing date in April 2020/2021 <p>Oldham Selective Licensing Facebook page</p> <ul style="list-style-type: none"> Posts to promote consultation/focus groups/one to ones. <p>District Hubs:</p> <ul style="list-style-type: none"> Email to promote in community/love area pages. <p>Greater Manchester Private Sector housing teams:</p> <ul style="list-style-type: none"> Email sent to promote to landlord contacts
January 2020 & January 2021	Councillors, residents, businesses and Oldham Council staff newsletter.	Newsletter
January 2020 and continuing	Wide publicity to landlords/landlord representatives & residents/businesses within the proposed areas/the borough of Oldham and outside Oldham.	<p>Website:</p> <ul style="list-style-type: none"> Proposals Promotion of events Statistical analysis Contact details Online survey (closed approx. July 2021)
January 2020 – April 2020	Arranged however the pandemic occurred which meant the events had to be cancelled.	Landlords drop-in sessions

<p>28/01/2021 18/01/2021 05/02/2021 11/02/2021 18/02/2021 19/02/2021 22/02/2021 25/02/2021 25/02/2021 26/02/2021 26/02/2021 26/02/2021 31/03/2021 08/04/2021 09/04/2021 27/04/2021</p>	<p>15 landlord/landlord representatives and 1 resident one to one discussions were held. The majority of the landlords/landlord representatives who attended the focus groups also attended the one-to-one discussions</p>	<p>One to one discussions – 1 hour session.</p> <p>Promotion on website/social media/emails to landlords.</p>
<p>10/03/2021 1 – 2pm 18/03/2021 6 - 7pm 23 March 10 – 11am</p>	<p>17 landlords/landlord representatives attended the focus groups held over three sessions.</p>	<p>Focus groups to enable discussions on a number of questions relating to the proposals.</p> <p>Promotion on website/social media/emails to landlords.</p>
<p>March 2021</p>	<p>2870 licensed landlords and managing agents under the previous selective licensing scheme.</p>	<p>Mail out including proposals/paper survey/website details and contact for further information.</p>
<p>March 2021</p>	<p>All residents and businesses in the surrounding streets to the proposed selective licensing areas.</p>	<p>Mail out including proposals/paper survey/website details and contact for further information.</p>
<p>26 February 2021</p>	<p>66 Stakeholders from the following organisations:</p> <ul style="list-style-type: none"> • National Residential Landlords Associations. • Northwest Landlords • Shelter • The Bond Board • Tenants Union • Arla – Reps • GM Law • First Choice Homes Oldham • Guinness Partnership • Jigsaw Homes • Places for People • Onward Homes • Regenda • City West Housing Ass • For Housing • Housing 21 • Riverside Housing Ass • Anchor • Citizen Advice Bureau • WTB Solicitors 	<p>Emails regarding the proposals, link to website and contact details.</p>

	<ul style="list-style-type: none"> • Broudie Jackson Canter Solicitors • GM Fire Service • Immigration Enforcement (Home Office) • GM Police • Housing Strategy • GM Ethical Lettings 	
February/March 2021	Landlords/managing agents/licensed HMO landlords/previous selective licensing landlords who signed up to emails	Emails regarding the proposals, online survey, link to website and contact details.
January 2020 – June/July 2021	Wide publicity to landlords/landlord representatives & residents/businesses within the proposed areas/the borough of Oldham and outside Oldham.	Online survey
January 2020 – August 2021	Contact regarding general information and enquiries including completing the survey online from approximately 91 landlords/agents, 21 residents and 4 businesses. Informed of consultation if they were not contacting us regarding this.	Telephone enquires
January 2021 – April 2021	All contacts – residents/businesses/landlords/stakeholders/council teams receiving an email from the Food Safety/Health and Safety & Neighbourhood Teams	Consultation banner on emails

**3
c** **What do you know?**

Information from the 2011 Census, demonstrates that overall, there is no disproportionate impact

As stated in Stage two of this report regarding equality monitoring of landlords and tenants.

The Council's Tenancy Relations and Homelessness Service stated that for the last two years there is issue with landlords not completing repairs in some harassment cases, the cases that have been complaints of harassment of unlawful eviction 98% are in receipt of a state benefit and rent arrears has been key trigger for the harassment or unlawful eviction.

Most complaints come from OL8 and OL9 areas, of which are included within the Selective Licensing proposals preferred option.

Oldham Homelessness Review 2016 – 2020 provides information regarding residents and tenants who approach the homelessness service.

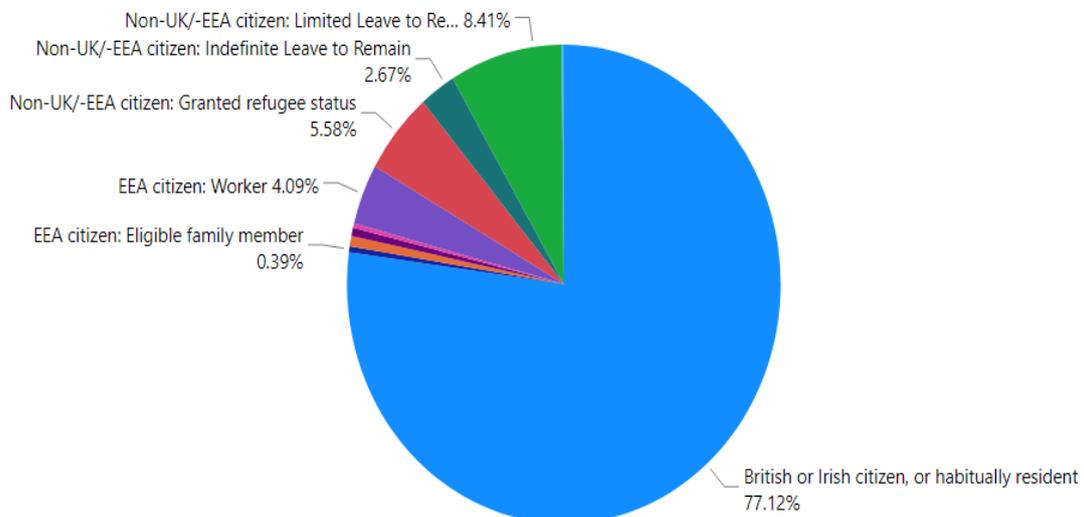
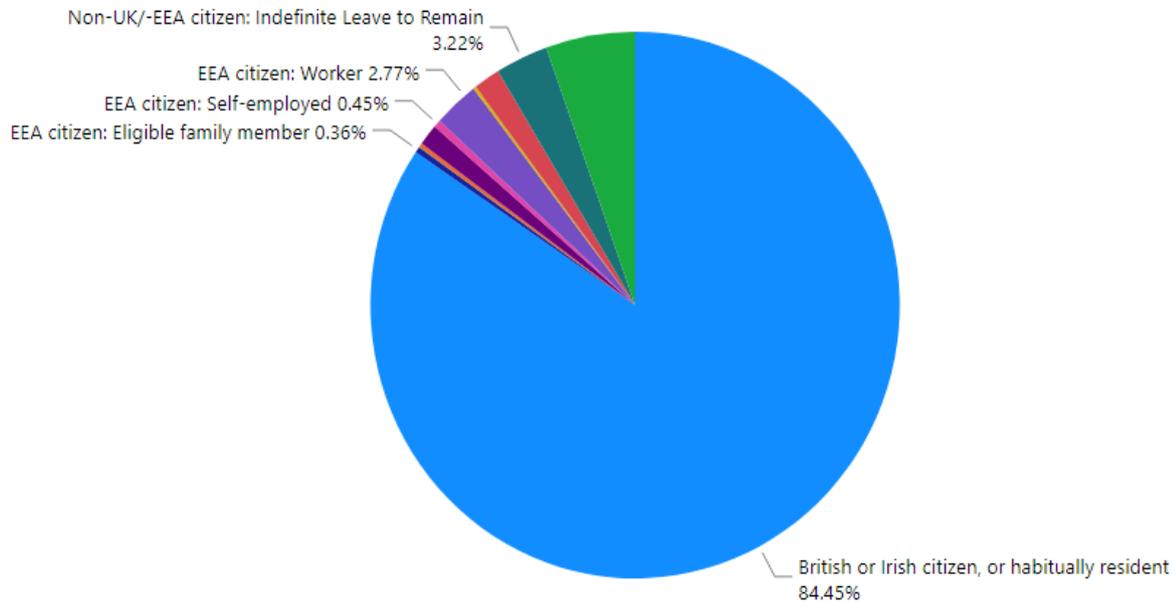
There has been a steady increase in the number of households making homeless applications over the past two years since the Homelessness Reduction Act was introduced. This trend is not exclusive to Oldham, with homelessness increasing across the country – Relief duties increased by 15% in 2019-20.

The main reason for homelessness – which continues to rise – is applicants being asked to leave by friends or family.

One fifth of homeless applicant's state to have mental health issues.

Habitually resident British or Irish citizens are the main eligible group who apply for homelessness assistance in Oldham, but there has been an increase in applications from other groups in recent years. The increase is biggest amongst EEA workers and people granted refugee status – correlating with an increase in applications from people becoming homeless after being asked to leave accommodation provided by the Home Office as asylum support.

The following charts show the change over the course of a year from 2018-19 to 2019-20 in the groups presenting as homeless – with a 5% increase in applications from those granted refugee status and 2% increase in EEA workers.



Homeless applicants are asked to provide information on their ethnicity on a voluntary basis, which can be used to establish whether any groups are disproportionately affected or not being reached by services despite being represented in Oldham.

The following sets out applications under the HRA compared with UK Census Data. Whilst the last Census was in 2011 and is set to be reviewed, it does highlight some potential inequalities which require investigation through the 2021 Homelessness Strategy.

Ethnic Group	Census	HRA applications 2018-2020
White	77.5%	65.3%
Pakistani	10.1%	7.6%
Bangladeshi	7.3%	5.2%
Indian	0.7%	0.3%
Black	1.2%	9%
Mixed	1.8%	2.6%
Other	1.4%	10%

Applications amongst different age groups have remained broadly the same during the past two years.

There has been a slight increase in presentations from over 65-year-olds – which is reflected in the increase in people declaring support needs due to old age.

	2018/19	2019/20
16-17	9 (<1%)	12 (1%)
18-24	243 (22%)	260 (20%)
25-34	361 (32%)	430 (34%)
35-44	252 (23%)	311 (24%)
45-54	182 (16%)	185 (15%)
55-64	53 (5%)	51 (4%)
65-74	13 (1%)	21 (2%)
75+	6 (<1%)	1
Not known	0	1

The majority of over 65s became homeless due to the loss of private rented sector tenancies.

The table below shows applicants by household type:

	2018/19	2019/20	2018/19	2019/20
	Relief Duty		Prevention Duty	
Single male plus dependents	15 (3%)	15 (3%)	12 (2%)	17 (2%)
Single female plus dependents	98 (18%)	114 (19%)	182 (32%)	156 (23%)
Single male	246 (45%)	282 (48%)	153 (27%)	238 (35%)
Single female	134 (24%)	104 (18%)	78 (14%)	123 (18%)
Single – other	0	0	0	1 (<1%)
Couple plus dependents	27 (5%)	32 (5%)	82 (14%)	92 (13%)
Couple	23 (4%)	34 (6%)	35 (6%)	34 (5%)
3+ adults plus dependents	4 (1%)	3 (1%)	15 (3%)	15 (2%)
All adult household	1 (<1%)	4 (1%)	14 (2%)	4 (1%)
Not known	0	1 (<1%)	0	3 (1%)

3 d What don't you know?

We do not hold and have access to data about all landlords/agents/tenants and residents in Oldham.

What might the potential impact on individuals or groups be?

3	Generic (impact across all groups)	No disproportionate effect.
e	Disabled people	No disproportionate effect.
	Particular ethnic groups	No disproportionate effect.
	Men or women (<i>include impacts due to pregnancy / maternity</i>)	No disproportionate effect.
	People of particular sexual orientation/s	No disproportionate effect.
	People in a Marriage or Civic Partnership	No disproportionate effect.
	People who are proposing to undergo, are undergoing, or have undergone a process or part of a process of gender reassignment	No disproportionate effect.
	People on low incomes	Vulnerable families may be illegally harassed or evicted due to landlords avoiding the licensing scheme.
	People in particular age groups	No disproportionate effect.
	Groups with particular faiths and beliefs	No disproportionate effect.
	Other excluded individuals (<i>e.g. vulnerable residents, individuals at risk of loneliness, carers or service and ex-serving members of the armed forces</i>)	No disproportionate effect.

Stage 4: Reducing / Mitigating the Impact

4a	What can be done to reduce or mitigate the impact of the areas you have identified?	
	Impact 1	Proposal
	Potential increase in rent for tenants	For those who qualify for Housing Benefit, the effect of the increase will be covered by this
	Impact 2	Proposal
	Cost implications for landlords	The fee is going to be split into two payments with an administration fee for the processing of the application and then a monitoring/compliance fee on a licence being granted. The Council is considering payment options for landlords.
	Impact 3	Proposal
Displacement of landlords Impact on landlords	As landlords become registered for the Licence, the Council will be able to build up a database and profile of landlords to evaluate and monitor potential impact on an ongoing basis. The Council will include equalities monitoring information as part of this, as previously completed under the 2015 – 2020 scheme The Council will consider proposing to mitigate the chances of displacement by closely monitoring and focusing its enforcement activities to those areas where any displacement occurs.	

		With regards to displacement of tenants, this is something the Council proposes to monitor closely. It will consider working with numerous stakeholders to reduce the risk including landlords, Housing Associations, the Police, Social Services, etc.
	Impact 4	Proposal
	Language/education level barriers	<p>Accessibility for support and advice will be provided with working with landlords/tenants as the Council's first option.</p> <p>Selective licensing will work with the District Hub teams and Stronger Communities teams to ensure provision and access of information/support.</p>
	Impact 5	Proposal
	Low income/vulnerable families may be illegally harassed or evicted due to landlords avoiding the licensing scheme.	<p>Accessibility for support and advice will be provided</p> <p>Selective Licensing have strong working relationship with the Tenancy Relations and Homelessness Team.</p>

4b	Have you done, or will you do anything differently, as a result of the EIA?
	<p>Payment options will be discussed by Leadership and Cabinet</p> <p>Accessibility for support and advice will be provided with working with landlords/tenants as the Council's first option.</p>
4c	How will the impact of the project, policy or proposal and any changes made to reduce the impact be monitored?
	<p>The Council will aim to agree a monitoring framework in consultation with local stakeholders. The measures that we will seek to monitor include:-</p> <ul style="list-style-type: none"> • The number of landlords applying for a licence in the designated areas against number of identified private rented sector properties; • The number of 'in process' applications and the stages they are at; • Time taken to process applications; • The number of licences granted; • The number and outcome of refused licence applications (including number of appeals); • The number of prosecutions of non-applying landlords; • The number of prosecutions for breach of licence conditions; • The number of homelessness presentations from within and outside the designation area; • Impact on empty properties; • Impact on house values; • The number of landlord and tenant complaints.

Conclusion

This section should record the overall impact, who will be impacted upon, and the steps being taken to reduce / mitigate the impact

- The overall impact for the wider community should be a positive one and benefit everyone by helping to raise management standards of properties. Landlords should see the benefits of the scheme through receiving improved rental income and potential capital value as areas improve through improved management of rental properties. Payment options are to be considered by Council Leadership to reduce any financial burden on landlords. Tenants should see an improvement in management standards of the properties that they rent, including improved safety of living conditions,
- Improvements to the neighbourhood would also benefit private tenants' security and sense of community.
- Should the costs of the Scheme be passed on to the tenant then this increase is minimal per week, and this increase would be covered for those on Housing Benefit.

Stage 5: Signature

Role	Name	Date
Lead Officer		
Approver Signatures		

EIA Review Date:	
------------------	--

Further guidance and information on Equality Impact Assessments is available here – http://intranet.oldham.gov.uk/downloads/download/35/equality_impact_assessments